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LAW OFFICES  
HOWARD J. STECHEL  
A PROFESSIONAL CORPORATION  
FIRST INTERSTATE BANK BUILDING  
6255 SUNSET BOULEVARD, SUITE 2000  
LOS ANGELES, CALIFORNIA 90028  
(213) 464-8464

Attorney for Plaintiff and Cross-  
Defendant CHURCH OF  
SCIENTOLOGY OF CALIFORNIA

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY OF )  
CALIFORNIA, a California )  
Corporation, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
GERALD ARMSTRONG, et al., )  
 )  
Defendants. )  
 )  
 )  
AND RELATED CROSS-ACTION. )  
 )

Case No. C 420 153  
  
REQUEST FOR ADMISSIONS  
[C.C.P. §2033]  
  
(Set No 2)

TO: ALL PARTIES, AND TO THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that plaintiff and cross-defendant,  
CHURCH OF SCIENTOLOGY OF CALIFORNIA, a California corporation,  
hereby requests that defendant and cross-complainant, GERALD  
ARMSTRONG, admit, pursuant to Code of Civil Procedure, Section  
2033, the truth of each of the following matters of fact within  
thirty (30) days after the date of service of this request.

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REQUEST FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1:

The document annexed hereto as Exhibit "1" and incorporated by reference into this Request for Admission No. 1 is genuine.

REQUEST FOR ADMISSION NO. 2:

The document annexed hereto as Exhibit "1" and incorporated by reference into this Request for Admission No. 2 contains the genuine signature of GERALD ARMSTRONG.

REQUEST FOR ADMISSION NO. 3:

The document annexed hereto as Exhibit "2" and incorporated by reference into this Request for Admission No. 3 is genuine.

REQUEST FOR ADMISSION NO. 4:

The document annexed hereto as Exhibit "2" and incorporated by reference into this Request for Admission No. 4 was received by GERALD ARMSTRONG.

REQUEST FOR ADMISSION NO. 5:

Between February, 1971 and December, 1981 GERALD ARMSTRONG was a staff member of Scientology organizations.

REQUEST FOR ADMISSION NO. 6:

During the period January, 1980 to December, 1981, GERALD ARMSTRONG was in charge of the Archives Project.

////

1 REQUEST FOR ADMISSION NO. 7:

2           The Archives Project involved the collecting and maintain-  
3 ing of information, artifacts and memorabilia concerning Scientology,  
4 Dianetics and L. Ron Hubbard.

5  
6 REQUEST FOR ADMISSION NO. 8:

7           Part of the responsibility of GERALD ARMSTRONG with respect  
8 to the Archives Project was to collect and maintain documents,  
9 information and artifacts concerning the early history of Dianetics.

10  
11 REQUEST FOR ADMISSION NO. 9:

12           Part of the responsibility of GERALD ARMSTRONG with respect  
13 to the Archives Project was to collect and maintain documents,  
14 information and artifacts regarding the founder of Scientology,  
15 L. Ron Hubbard.

16  
17 REQUEST FOR ADMISSION NO. 10:

18           As part of his responsibility with respect to the Archives  
19 Project, GERALD ARMSTRONG was authorized to travel and to interview  
20 persons concerning the history of Dianetics and Scientology and  
21 concerning L. Ron Hubbard.

22  
23 REQUEST FOR ADMISSION NO. 11:

24           As part of his responsibility with respect to the Archives  
25 Project, GERALD ARMSTRONG was authorized to negotiate for the pur-  
26 chase of materials and artifacts concerning the history of Dianetics  
27 and Scientology and concerning the life of L. Ron Hubbard.

28 ////



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1 REQUEST FOR ADMISSION NO. 12:

2           During the time that GERALD ARMSTRONG was in charge of  
3 the Archives Project, said project was located at 4833 Fountain  
4 Avenue, Los Angeles, California.

5  
6 REQUEST FOR ADMISSION NO. 13:

7           As part of his responsibility with respect to the Archives  
8 Project, GERALD ARMSTRONG was responsible for coordinating with  
9 Omar V. Garrison, an author who had been retained to write an  
10 authorized biography of L. Ron Hubbard, and to provide Omar V.  
11 Garrison with information he might require for said biography.

12  
13 REQUEST FOR ADMISSION NO. 14:

14           During the time that GERALD ARMSTRONG was in charge of the  
15 Archives Project, a portion of the materials contained in said  
16 project was the personal property of CHURCH OF SCIENTOLOGY OF  
17 CALIFORNIA.

18  
19 REQUEST FOR ADMISSION NO. 15:

20           During the time that GERALD ARMSTRONG was in charge of  
21 the Archives Project, he removed original materials contained in  
22 said project from their location within said Project's area.

23  
24 REQUEST FOR ADMISSION NO. 16:

25           During the period from January, 1982 through and including  
26 September 3, 1982, GERALD ARMSTRONG maintained in his possession or  
27 in the possession of his attorneys, agents or others designated by  
28 him, copies of materials contained in the Archives Project.

1 REQUEST FOR ADMISSION NO. 17:

2           During the period from January, 1982 through and including  
3 September 3, 1982 GERALD ARMSTRONG was responsible for the Archives  
4 Project.

5  
6 REQUEST FOR ADMISSION NO. 18:

7           During the period from January, 1982 through and including  
8 September 3, 1982, GERALD ARMSTRONG maintained in his possession or  
9 in the possession of his attorneys, agents or others designated by  
10 him, original materials that had been contained in the Archives  
11 Project.

12  
13 REQUEST FOR ADMISSION NO. 19:

14           During the period from May, 1982 through and including  
15 August, 1982, GERALD ARMSTRONG was in charge of the Archives Project.

16  
17 REQUEST FOR ADMISSION NO. 20:

18           During the period from May, 1982 through and including  
19 August, 1982, GERALD ARMSTRONG provided copies of materials con-  
20 tained in the Archives Project to persons who had not been authorized  
21 by CHURCH OF SCIENTOLOGY OF CALIFORNIA to receive said materials.

22  
23 REQUEST FOR ADMISSION NO. 21:

24           During the period from May, 1982 through August, 1982,  
25 GERALD ARMSTRONG provided original materials that had been contained  
26 in the Archives Project to persons who had not been authorized by  
27 CHURCH OF SCIENTOLOGY OF CALIFORNIA to receive said materials.

28 ////

1 REQUEST FOR ADMISSION NO. 22:

2           While performing his responsibilities concerning the  
3 Archives Project, GERALD ARMSTRONG was aware of the confidential  
4 nature of the materials contained in said project.

5  
6 REQUEST FOR ADMISSION NO. 23:

7           Between March, 1982 and August, 1982, GERALD ARMSTRONG  
8 acted without authority of CHURCH OF SCIENTOLOGY OF CALIFORNIA in  
9 making copies of materials that had been in the Archives Project.

10  
11 REQUEST FOR ADMISSION NO. 24:

12           Between March, 1982 and September, 1982, GERALD ARMSTRONG  
13 acted without authority of CHURCH OF SCIENTOLOGY OF CALIFORNIA in  
14 retaining materials contained in the Archives Project.

15  
16 REQUEST FOR ADMISSION NO. 25:

17           Between March, 1982 and September, 1982, GERALD ARMSTRONG  
18 used and possessed for his own purposes and without authorization  
19 of CHURCH OF SCIENTOLOGY OF CALIFORNIA, materials that had been  
20 contained in the Archives Project.

21  
22 REQUEST FOR ADMISSION NO. 26:

23           Between March, 1982 and September, 1982, GERALD ARMSTRONG  
24 used and possessed for his own purposes and without authorization of  
25 CHURCH OF SCIENTOLOGY OF CALIFORNIA, copies of materials that had  
26 been contained in the Archives Project.

27 ////

28 ////



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1 REQUEST FOR ADMISSION NO. 27:

2 GERALD ARMSTRONG requested and accepted the position  
3 whereby he was in charge of the Archives Project.  
4

5 REQUEST FOR ADMISSION NO. 28:

6 GERALD ARMSTRONG accepted a position as a director of the  
7 Board of Directors of Ralston-Pilot Publishing Company.  
8  
9

10 NOTE: IF YOU FAIL TO COMPLY WITH THE PROVISIONS OF SECTION 2033  
11 OF THE CODE OF CIVIL PROCEDURE WITH RESPECT TO THIS REQUEST FOR  
12 ADMISSIONS, EACH OF THE MATTERS OF WHICH AN ADMISSION IS REQUESTED  
13 WILL BE DEEMED ADMITTED.  
14

15 END OF REQUEST FOR ADMISSIONS

16 DATED: April 19, 1983  
17

18 LAW OFFICES OF  
19 HOWARD J. STECHEL,  
20 A Professional Corporation

21 By Howard J. Stechel  
22 HOWARD J. STECHEL  
23 Attorney for Plaintiff and Cross-  
24 Defendant, CHURCH OF SCIENTOLOGY  
25 OF CALIFORNIA  
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